



South Coast Air Quality Management District
Engineering & Compliance

APPLICATION PROCESSING AND CALCULATIONS

APPLICATION NO.
469193

DATE
4/2/13

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PROCESSED BY
Angelita Alfonso

CHECKED BY

PERMIT TO OPERATE

COMPANY NAME: PARAMOUNT PETROLEUM CORP
ID No. 800183

MAILING ADDRESS: 14700 Downey Ave
Paramount, CA 90745

EQUIPMENT LOCATION: 14700 Downey Ave
Paramount, CA 90745


CONTACT PERSON: Kathryn Gleeson
(562) 748-4613

EQUIPMENT DESCRIPTION

Additions to the Facility Permit are noted in underlines and deletions are noted in ~~strikeouts~~.

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

Equipment	ID No.	Conn To	RECLAIM Source Type/ Monitoring Unit	Emissions And Requirements	Conditions
Process 8: LOADING/UNLOADING FACILITIES					
System 19: VAPOR RECOVERY FOR GASOLINE LOADING FACILITY NO. 20 & 21					S18.3
TOWER, SATURATOR, <u>D-718</u> HEIGHT: 10 FT 5.5 IN; DIAMETER: 2 FT 6 IN A/N: 439655 <u>469193</u>	D243				
ABSORBER, <u>D-719</u> HEIGHT: 17 FT 4 IN; DIAMETER: 1 FT 6 IN A/N: 439655 <u>469193</u>	D244				
TOWER, AIR STRIPPER, <u>D-720</u> HEIGHT: 11 FT 7 IN <u>5 FT 6 IN</u> DIAMETER: 2 FT 1 FT 6 IN A/N: 439655 <u>469193</u>	D245				
<u>GAS ELIMINATOR, D-721</u> HEIGHT: 3 FT ; <u>DIAMETER: 2 FT</u> A/N: <u>469193</u>	<u>Dxxx</u>				

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Equipment	ID No.	Conn To	RECLAIM Source Type/ Monitoring Unit	Emissions And Requirements	Conditions
COOLER, TWO STAGE CONDENSATE WITH INTEGRAL CONDENSATE SCRUBBER, A/N: 439655 469193	D246				
COMPRESSOR, EAST, C-727 A/N: 439655 469193	D247				
COMPRESSOR, WEST, C-728 A/N: 439655 469193	D248				
TANK, SPHERICAL GAS HOLDER, 20000 CU FT A/N: 439655 469193	D249				
KNOCKOUT DRUM D-768, HEIGHT: 3 FT 8 IN; DIAMETER: 1 FT 8 IN A/N: 469193	Dxxx	D374 D375 D376			E336.x E336.y
FUGITIVE EMISSIONS, MISCELLANEOUS A/N: 439655 469193	D830				H23.23
Process 15: AIR POLLUTION CONTROL					
System 1: FLARE VAPOR RECOVERY SYSTEM				S13.2, S13.3, S56.1, S58.1	
System 2: REFINERY FLARE SYSTEM				S13.2, S58.2	

CONDITIONS

S18.3 All affected devices listed under this process/system shall be used only to receive, recover and/or dispose of vent gases routed from the system(s) or process(es) listed below, in addition to specific devices identified in the “connected to” column:

Gasoline Tank Truck Loading Racks (Process 8, System 18 & 27)

[Rule 1303(a)(1)-BACT, 5-10-1996; Rule 1303(a)(1)-BACT, 12-6-2002; Rule 1303(b)(2)-Offset, 5-10-1996; Rule 1303(b)(2)-Offset, 12-6-2002; Rule 462, 5-14-1999]
[Systems subject to this condition: Process 8, System 19]

S58.1 The Flare Vapor Recovery System shall only be used to receive and handle vent gases from the following Process(es) and System(s):

Crude Unit (Process: 1, System: 1, 2, 4, 5, 6, & 7)



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Hydrotreating Unit (Process: 2, System: 1, 3, & 4)
Catalytic Reforming Unit (Process: 3, System: 1)
Treating, Stripping (Process: 6, System: 1, 2, 4, 5, 6 & 7)
Vapor Recovery for Gasoline Loading Facility No. 20 & 21 (Process: 8, System: 19)
Sulfur Recovery Unit (Process: 7, System: 2)
Storage Tanks (Process: 10, System: 3)
Miscellaneous (Process: 13, System: 6)
Isomerization (Penex Plus) Process (Process: 16, System: 1, 2 & 3)

The flare gas recovery system shall be operated in full use when any of the above Process(es) and System(s) is in operation. Full use means one of two compressor trains (Process 15, System 1) is online at any given time.

[**Rule 1303(a)(1)-BACT, 5-10-1996**; Rule 1303(a)(1)-BACT, 12-6-2002; **Rule 1303(b)(2)-Offset, 5-10-1996**; Rule 1303(b)(2)-Offset]
[Systems subject to this condition: Process 15, System 1]

S58.2

The Refinery Flare System shall only be used to receive and handle vent gases from the following Process(es) and System(s):

Crude Unit (Process: 1, System: 1, 2, 4, 5, 6, & 7)
Hydrotreating Unit (Process: 2, System: 1, 3, & 4)
Catalytic Reforming Unit (Process: 3, System: 1)
Treating, Stripping (Process: 6, System: 1, 2, 4, 5, 6 & 7)
Sulfur Recovery Unit (Process: 7, System: 2)
Vapor Recovery for Gasoline Loading Facility No. 20 & 21 (Process: 8, System: 19)
Storage Tanks (Process: 10, System: 3)
Miscellaneous (Process: 13, System: 6)
Flare Vapor Recovery System (Process: 15, System 1)
Isomerization (Penex Plus) Process (Process: 16, System: 1, 2 & 3)

The flare gas recovery system shall be operated in full use when any of the above Process(es) and System(s) is in operation. Full use means one of two compressor trains (Process 15, System 1) is online at any given time.


[**Rule 1303(a)(1)-BACT, 5-10-1996**; Rule 1303(a)(1)-BACT, 12-6-2002; **Rule 1303(b)(2)-Offset, 5-10-1996**; Rule 1303(b)(2)-Offset]
[Systems subject to this condition: Process 15, System 1]

Note that S58.1 and S58.2 are being updated as part of open PC applications A/N's 529077 and 526353.

E336.x

The operator shall vent the vent gases from this equipment as follows:

All emergency vent gases shall be directed to the Flare Vapor Recovery System (Process 15, System 1). If the flare vapor recovery system is operating at its capacity and is unable to receive additional vent gases, the emergency vent gases shall be directed to the Refinery Flare System (Process 15, System 2).

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This equipment shall not be operated unless the flare vapor recovery system and the refinery flare system are in full use and have a valid permit to receive vent gases from this equipment.

E336.y The operator shall vent the vent gases from this equipment as follows:

All normal vent gases shall be directed to any of the three boilers (D374, D375, D376).

This equipment shall not be operated unless at least one of the three boilers (D374, D375, D376) is in full use and have a valid permit to receive vent gases from this equipment.

[Rule 462, 5-14-1999; Rule 1303(a)(1)-BACT, 5-10-1996; Rule 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition: Dxxx]

H23.23 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	1173
VOC	40CFR60, SUBPART	GGG

[Rule 1173, 5-13-1994; Rule 1173, 2-6-2009; 40CFR60 Subpart GGG, 6-7-1985]

[Devices subject to this condition: D247, D248, D610, D616, D700, D820, D830]

BACKGROUND

Paramount Petroleum Corporation (Paramount) operates a petroleum refinery located at 14700 Downey Avenue in the city of Paramount in the southern portion of Los Angeles County. Paramount processes crude oil into a variety of products including specialized road and roofing asphalts, diesel fuel, jet fuel, gasoline and gasoline components. Emission sources at the refinery include combustion sources (heaters, boilers, and IC engines), fugitive components (pumps, valves, flanges, compressors, drains, etc.), cooling towers, storage tanks, flares and loading/unloading facilities. The South Coast Air Quality Management District (AQMD) identification number for the facility is 800183.

Paramount submitted A/N 469193 due to modification made to its Vapor Recovery System serving the Gasoline Loading facility by the addition of a knockout drum and the connection of this knockout drum pressure relief valve to the refinery flare. There are also administrative changes requested by Paramount that need to be made to the Vapor Recovery System. AQMD received the application package on May 11, 2007. This application was prescreened as a Status 20 (Class I) application. Upon review, it has been determined that this application should have been accepted as a Status 21 (Class III) application requiring a higher fee for failing to obtain a permit prior to modification, since the modification has already been done. An additional fee of **\$1,850.63** will be invoiced to the facility. Table 1 lists permit processing tracking information and fees.


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Table 1: Permit Administration & Application Tracking Information

APPLICATION NO.	436715
Equipment Description	Vapor Recovery Bulk Loading
Date Received	5/31/2007
Deemed Complete Date	02/29/08
Application Type	50
Application Status	21
Previous Application No.	139655, Active
B-CAT No.	00
C-CAT No.	57
Fee Schedule	D
Fee Required	\$ 5,551.88
Fee Submitted	\$ 3,701.25


COMPLIANCE RECORD REVIEW

A review of the AQMD Compliance Database showed 36 Notices of Violation (NOV) and Notices to Comply (NC) issued to Paramount in the past five years (03/01/08 – 03/01/13). All notices are either closed or in compliance status. The Stipulated Orders for Abatement (SOFA) are closed. Paramount is on a schedule to compliance on the Variance Cases. There is no record of any Notice of Violation or any public nuisance complaint specifically against the subject pieces of equipment in the past five years (03/01/08 – 03/01/13).

PERMIT HISTORY

A summary of the permitting history for the subject permit unit retrieved from the District's OnBase Records database is contained in the following table.

<i>Permit to Construct</i>		<i>Permit to Operate</i>		<i>Description of Permitting Activity</i>
<i>A/N</i>	<i>Issue Date</i>	<i>No</i>	<i>Issue Date</i>	
A36342		A36342	1968	PO was recommended in 1968.
A78384		P64637	10/30/75	Addition of a second compressor.
109128		M35407	1983	To vent absorber vent to the combustion air plenum of Boilers 7, 8 and 9 to comply with Rule 462.
139655		M50030	6/04/86	To replace pump J-739, screw type with a new pump, Roper gear type and an identical new standby spare pump for reliability.
469193				Subject of this evaluation for a PO no PC for

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<i>Permit to Construct</i>		<i>Permit to Operate</i>		<i>Description of Permitting Activity</i>
<i>A/N</i>	<i>Issue Date</i>	<i>No</i>	<i>Issue Date</i>	
				installing knockout drum with pressure relief valve connected to the flare.

PROCESS DESCRIPTION and EMISSIONS CALCULATION


Paramount operates a Rheem Superior Vapor Recovery System serving the Gasoline Tank Truck Loading Racks 20 and 21. The hydrocarbons are removed from the vapor collected from the trucks by compression and cooling. This is accomplished by passing the vapors displaced at the loading rack through a saturator countercurrently to gasoline pumped from storage. The saturated vapors then flow to the vaporsphere. Position of the diaphragm in the vaporsphere automatically actuates a compressor that draws the vapors from the sphere and injects them at about 200 psig into the absorber. Countercurrent flow of stripped gasoline from the saturator or of fresh gasoline from storage is used to absorb the hydrocarbon vapors. Gasoline from the absorber bottoms is returned to storage while the tail gases, are directed to the combustion air intake of Boilers 7 (D374), 8 (D375) and 9 (D376).

The absorber of the vapor recovery system was permitted in 1983 to vent from atmosphere to the combustion air intake of Boilers 7, 8 and 9 to comply with Rule 462. This permitted emissions control configuration was not reflected in the permits for the Boilers. This application is for the addition of a knockout drum, D-768, to recover condensed liquids in the vapor line from the absorber and the connection of this knockout drum to Boilers 7, 8 and 9 with its pressure relief valve (PRV) connected to the Refinery Flare Vapor Recovery System and Refinery Flare. To update the description showing this new permitted emissions control configuration, a "connect to" will be added to the knockout drum instead of the absorber connecting it to Boilers 7, 8 and 9. A copy of this engineering evaluation will be attached to the application folders of Boilers 7, 8 and 9 for documentation purposes.

In association with the venting of the knockout drum's PRV to the vapor recovery system/flare, vapor recovery and flare venting conditions S58.1 and S58.2 are being updated to show that they may receive vent gases from device Dxxx of Process 8, System 19. This change to the flare vapor recovery and flare venting conditions is being included under open A/N's 529077 and 526353.

Paramount also requests some administrative changes to the equipment description of the following devices for accuracy and completeness:

- Device ID D243: Add Paramount's equipment ID, D-718.
- Device ID D244: Add Paramount's equipment ID, D-719.
- Device ID D245: Add Paramount's equipment ID, D-720. Change the diameter dimension s from "2 FT to 1 FT 6 IN"; change the height dimesion from "11 FT 7 IN" to "5 FT 6 IN."
- D-721: This piece of equipment, along with D-720, was listed in the previous permit as "Air Stripper", 2'-0" DIA. X 11'-7" H." This language described two stacked vessels, an air stripper and a gas eliminator. Paramount requests they be listed separately.
- Device ID D247: Add Paramount's compressor equipment ID, C-727 and remove the description EAST.
- Device ID D248: Add Paramount's compressor equipment ID, C-728 and remove the description WEST.

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- Device ID D249: Add Paramount's equipment ID, S-01.


There are no emissions associated with the addition of the knockout drum, since the pressure relief valve is connected to a closed vent system. Fugitive emissions from two connectors are negligible.

RULES EVALUATION

PART 1: SCAQMD REGULATIONS

- Rule 212** Standards for Approving and Issuing Public Notice (Amended Nov 14, 1997)
 This rule requires public noticing for a modification or a new source located within 1000 feet of a school, if the project results in an increase in toxic air contaminant emissions resulting in exposure to a Maximum Individual Cancer Risk (MICR) of 1×10^{-6} or greater during a lifetime (70 years), or if the project results in an emissions increase exceeding limits stated in Rule 212(g). The equipment is not within 1000 feet of a school (refinery map showing the location of the project is included in the applicant's submittal), there is no increase in MICR associated with the project, and the project is not expected to result in an increase in criteria pollutant emissions exceeding limits stated in section 212(g). Therefore, public notice will not be required and compliance with Rule 212 is assured.
- Rule 401** Visible Emissions (Amended Nov. 9, 2001)
 Operation of the Vapor Recovery System for the Gasoline Loading facility is not expected to result in visible emissions. Therefore, compliance with this rule is expected.
- Rule 402** Nuisance (Adopted May 7, 1976)
 Operation of the Vapor Recovery System for the Gasoline Loading facility is not expected to result in a public nuisance. Therefore, compliance with this rule is expected.
- Rule 462** Organic Liquid Loading (Amended May 14, 1999)
 This rule is intended to control emissions of volatile organic compounds from facilities that load organic liquids with a vapor pressure of 1.5 psia or greater under actual loading conditions into any tank truck, trailers or railroad tank car. The Gasoline Loading Racks are subject to this rule and are tagged with Rule 462 emission limit. While the Gasoline Loading Racks are not the subject of this engineering evaluation, compliance to this rule is evaluated since the subject Vapor Recovery System controls the emissions from the loading racks.

According to Rule 462(i)(2), subparagraphs (d)(1)(A) and (d)(1)(B) shall not apply to vapor recovery and/or disposal systems which vent displaced hydrocarbon vapors to an adjacent refinery flare or other combustion device that receives gaseous streams from other refinery sources. Since the vapor recovery system vents to the combustion air intake of Boilers 7, 8 and 9, and since the boilers use refinery gas, the required CARB certified vapor recovery/control and Continuous Monitoring System (CMS) do not apply. With both the Vapor Recovery System and Boilers 7, 8, and 9 controlling the emissions from the Gasoline Loading Racks, the VOC emission limit of 0.08 lb /1000 gal loaded is easily complied with. The loading racks are designed and operated for bottom loading only. Facility complies with this rule.

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Reg IX Standards of Performance for New Stationary Sources (Amended March 5, 2010)

40 CFR 60 Subpart XX: Standards of Performance for Bulk Gasoline Terminals

The affected facility to which the provisions of this subpart apply is the total of all the loading racks at a bulk gasoline terminal which deliver liquid product into gasoline tank trucks. The Gasoline Loading Racks are subject to this subpart. Compliance is expected with the Vapor Recovery System installed.

40 CFR 60 Subpart GGG: Standards of Performance for Equipment Leaks of VOC in Petroleum Refineries for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006 (Amended June 2, 2008)

This regulation is applicable to affected facilities in refineries that begin construction after November 7, 2006 per §60.590a. The following are affected facilities under this subpart:

- Compressors
- The group of all equipment within a process unit

The equipment leak inspection and monitoring requirements of this regulation have been incorporated into Paramount's Inspection and Monitoring (I&M) Program for fugitive emissions. The facility submits Quarterly Report to the EPA and SCAQMD. The report for the last four quarters is included in the applicant's submittal. Continued compliance is expected.

Reg X National Emission Standards for Hazardous Air Pollutants (Amended April 4, 2008)

There are currently no NESHAP standards that apply to the Vapor Recovery for Gasoline Loading facility as outlined in the District's Regulation X.

Reg XI Source Specific Standards

Rule 1173: Fugitive Emissions of Volatile Organic Compound (Amended February 6, 2009)

The fugitive components of the Vapor Recovery for Gasoline Loading facility are subject to this rule. With proper implementation of the applicant's extensive inspection program, no violation is expected. The facility submits Rule 1173 Quarterly Report to the SCAQMD. The report for the last four quarters is included in the applicant's submittal. Paramount also submitted the most recent monitoring of components in the area of the two loading racks and the vapor recovery system. Continued compliance is expected.

Reg XIII New Source Review (NSR)

Rule 1303: Requirements (Amended Dec. 6, 2002)

This rule allows the Executive Officer to deny a Permit to Construct for any new, modified or relocated source which results in an emission increase of any non-attainment air contaminant, any ozone depleting compound, or ammonia, unless BACT is used. This rule also requires modeling and offset (among other requirements) if there is a net increase in any non-attainment air contaminants for any new or modified source.



- (a) Best Available Control Technology (BACT)
The pressure relief valve will be connected to the flare vapor recovery system. Paramount complies with this requirement.
- (b) This subdivision lists the following requirements for a Permit to Construct for any new or modified source which results in a net emission increase of any nonattainment air contaminant at a facility.
 - (1) Modeling
 - (2) Emission Offsets
 - (3) Sensitive Zone Requirements
 - (4) Facility Compliance
 - (5) Major Polluting Facilities
 - A. Alternative Analysis
 - B. Statewide Compliance
 - C. Protection of Visibility
 - D. Compliance Through California Environmental Quality Act

Since the modification does not result in a net emission increase of any nonattainment air contaminant, all the requirements of this subdivision do not apply.

Reg XIV

Toxics and Other Non-Criteria Pollutants

Rule 1401: New Source Review of Toxic Air Contaminants (Amended March 4, 2005)

This rule specifies that a project not result in an increase in maximum individual cancer risk (MICR) greater than 1×10^{-6} , or 10×10^{-6} if T-BACT is used, that the noncancer acute and chronic hazard index (HI) not exceed 1.0 and that the cancer burden not exceed 0.5 from new permit units, relocations or modifications to existing permit units which emit toxic air contaminants listed in Table 1 of this rule.

1401(g)(1)(B) Exemptions – Modification with No Increase in Risk

The requirements of this rule shall not apply to a modification of a permit unit that causes a reduction or no increase in the cancer burden, MICR or acute or chronic HI at any receptor location. Since the proposed changes will not cause an increase in toxic air contaminants, it is exempt from the requirements of this rule.


Reg XVII

Prevention of Significant Deterioration (PSD)

This regulation sets forth preconstruction review requirements for stationary sources to ensure that air quality in clean air areas does not significantly deteriorate while maintaining a margin for future industrial growth.

The SCAQMD is presently considered in attainment for the following criteria pollutants: NO₂, SO₂, CO and Lead; thus these pollutants are subject to PSD regulations.

According to the guidance provided in Mohsen Nazemi's email dated August 14, 2007, the AQMD has signed a new Limited PSD Delegation agreement with EPA effective July

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25, 2007. Therefore, effective July 25, 2007, the AQMD has PSD responsibility for all new PSD sources and all modifications to existing PSD sources where the applicant is requesting to use the existing Regulation XVII to determine PSD applicability for a modification and not the recent calculation methodology adopted by the EPA as part of the NSR Reform.

The requirements of this regulation are not applicable for the proposed changes covered in this engineering evaluation since there is no net increase in annual emissions of any of the attainment air contaminant.

Reg XX Regional Clean Air Incentives Market (RECLAIM)

There are no NO_x or SO_x emissions associated with the Vapor Recovery system for the Gasoline Loading facility; therefore, this regulation does not apply.

Reg XXX Title V Permits

Rule 3001(a): Applicability (Amended November 14, 1997)

The Title V Permit system is the air pollution control permit system required to implement the federal Operating Permit Program as required by Title V of the federal Clean Air Act as amended in 1990. Paramount's initial Title V permit was issued on March 19, 2009.

Rule 3005: Permit Revisions (Amended March 16, 2001)

The permit for this project will be issued as a minor revision of the Title V permit since the revision meets all of the requirements of Rule 3000(b)(12) and will be sent to the EPA for a 45-day review per Rule 3005(c)(2)(B). This revision does not result in an increase in VOC emissions. Public Notice is not required per Rule 3006(b).

PART 2: STATE REGULATIONS

CEQA California Environmental Quality Act

CEQA requires that the environmental impacts of proposed projects be evaluated and that feasible methods to reduce, avoid or eliminate identified significant adverse impacts of these projects be considered. The CEQA Applicability Form (400-CEQA) submitted by Paramount indicates that the project does not have any impacts which trigger the preparation of a CEQA document; therefore a CEQA analysis is not required.

PART 3: FEDERAL REGULATIONS

40 CFR 63 Subpart BBBBBB: Emissions Standards for Hazardous Air Pollutants (NESHAP) for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities

Subpart BBBBBB establishes national emission and operating limitations for HAP emitted from gasoline loading activities at an area source of HAP emissions. Paramount has provided data to the District to show that Paramount Refinery is an area source of



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HAPs (not major source) which is defined as a source emitting less than 10 tons per year of any single HAP or less than 25 tpy of all HAPs combined.

The emission sources to which this subpart applies are gasoline storage tanks, gasoline loading racks, gasoline cargo tanks, and equipment components in vapor or liquid. The Gasoline Loading Racks are subject to this subpart. Compliance is expected with the Vapor Recovery system installed. With both the Vapor Recovery System and Boilers 7, 8, and 9 controlling the emissions from the Gasoline Loading Racks, the VOC emission limit of 0.66 lb /1000 gal loaded is easily complied with. The loading racks are designed and operated for bottom loading only. Facility complies with this rule.

Note: Federal Rules 40CFR60 Subpart XX 40CFR60 and Subpart GGG applicability is evaluated under Regulation IX above.

CONCLUSION AND RECOMMENDATION

The operation of the Vapor Recovery for Gasoline Loading facility is expected to comply with all applicable District, State and Federal Rules and Regulations. Therefore, issuance of Permit to Operate is recommended.